

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Structure and Practices of the Video Relay)	CG Docket No. 10-51
Service Program)	
)	
Telecommunications Relay Services and)	CG Docket No. 03-123
Speech-to-Speech Services for Individuals with)	
Hearing and Speech Disabilities)	

REPLY COMMENTS OF SPRINT CORPORATION

Sprint Corporation (“Sprint”) hereby submits these reply comments in response to the Report and Order and Further Notice of Proposed Rulemaking released by the Federal Communications Commission (“FCC” or “Commission”) in the above-captioned proceeding.¹ Sprint’s focuses its reply comments on three topics.

I. VRS Auction/Bidding Process Should Exclude Federal VRS Services

The FNPRM proposed a Video Relay Service (“VRS”) auction/bidding process for the top 100 dialed numbers and cited Internal Revenue Service and the Social Security Administration as potential numbers available for bidding.² While the parties’ comments were generally supportive of the auction/bidding process, the Commission should ensure, to the extent such a VRS auction/bidding process is adopted, that it exempts or otherwise excludes VRS that

¹ *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order and Further Notice of Proposed Rulemaking, FCC 13-82 (rel. June 10, 2013) (“Order” or “FNPRM” or “Further Notice”).

² FNPRM at ¶ 223.

Sprint provides to the federal government via contracts with the General Services Administration (GSA).

Sprint has provided Federal Relay services through a contract with the GSA since April 1993. Sprint's current contracts with the GSA cover six different Relay services including TTY, Speech to Speech, IP Relay, Captioned Telephone, Relay Conference Captioning, and Video Relay. In early 2004, Sprint began providing VRS to the federal government through a GSA contract. Additionally, Video Remote Interpreting ("VRI") became a feature of the Federal Video Relay service in January of 2013. Importantly, Federal VRS traffic and minutes are billed through GSA, and they do not have an impact on the Interstate TRS fund. As such, Sprint's Federal VRS should be considered as completely separate from general consumer offerings of VRS.

Moreover, Federal Video Relay service is required to meet a unique set of security requirements that other national VRS providers are not required to meet. These security standards allow federal government agencies to have confidence in the usage of Federal Relay services. Indeed, the GSA contract lists a large number of security standards to which Sprint must adhere in its provision of Federal TRS-related services. VRS are no exception to this rule, and many agencies require their employees to utilize Sprint's Federal Video Relay option in order to ensure security within their agencies. Additionally, with many years of experience, Sprint's staff is very experienced and proficient in interpreting Federal government terminology. This gives federal employees, who prefer sign language as their main mode of communication, the ability to communicate more effectively – and securely – in the workplace.

In short, because of its unique nature and security characteristics, Federal VRS as provided by Sprint to government agencies should be exempt from the VRS market-based pricing proposals.

II. Neutral Platforms Should be Evaluated Before Extension to other Forms of iTRS

The Commission sought comment on whether it should extend the capabilities of the neutral video communications service provider to other forms of iTRS including IP CTS and IP Relay.³ Sprint concurs with Purple’s comments “that the Commission should learn from its experience with the use of a neutral provider through VRS before it considers adopting a similar approach for IP Relay and IP CTS.”⁴ Purple also pointed out that IP Relay is a declining market served by only two providers. As one of the remaining IP Relay providers, Sprint shares Purple’s concern about “further investment of time and money developing a centralized platform for a service in this state of maturity.” Further, Sprint agrees with Purple that IP CTS is not a good candidate for such a neutral platform due to competing technologies that underlie the equipment and services in the market today. As such, Sprint suggests the Commission take a cautious, wait-and-see approach before giving serious consideration to extending such neutral platforms to other forms of iTRS. The Commission should evaluate the VRS neutral platform after several years before considering expanding the concept to other TRS services.

III. The Advisory Council’s Scope Should be Expanded and Provider Participation Should be Permitted

³ FNPRM at ¶ 253.

⁴ See, Comments of Purples Communications, Inc. at p. 17.

The Commission proposes to dissolve the existing TRS Fund Advisory Council and replace it with a new advisory committee that focuses on issues beyond “cost recovery matters.”⁵ Further, the Commission proposes to prohibit providers from participating in the advisory committee.⁶

Sprint strongly urges the Commission to give weight to the comments submitted by the Interstate Telecommunications Relay Services Fund Advisory Council (“TRS Advisory Council”). Sprint agrees with the TRS Advisory that the advisory council should, if anything, be expanded (not contracted) both in terms of scope and membership/participation. With regard to the scope, the TRS Advisory Council believes the advisory council should advise on a total of six topics: (1) Technology; (2) Efficiency; (3) Outreach; (4) User Experience; (5) Eligibility, Registration and Verification; and (6) Porting and Slamming. Sprint agrees with these expanded areas of focus, and urges the Commission to modify the charge and responsibilities of the advisory council accordingly.

The TRS Advisory Council also states that it “is of the opinion that having providers on the Council, with the change in focus, should continue.”⁷ Consistent with Sprint’s position, the TRS Advisory Council urges the Commission to retain TRS providers as members of the council because they “continue to bring valuable reality-based perspectives [sic] provide excellent insight into the feasibility of various solutions and approaches and an understanding of the actual costs of providing relay service.”⁸ The TRS Advisory Council also cautions that disbanding the advisory council will lead to the “loss of institutional knowledge” and, therefore, urges the

⁵ FNPRM ¶¶ 244-249.

⁶ *Id.* at ¶ 248.

⁷ *See*, Comments of the Interstate Telecommunications Relay Services Fund Advisory Council at p.

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⁸ *Id.*

Commission to retain the council as is with expanded membership to include “stakeholders such as the Gallaudet University Technology Access Program, Gallaudet and University of Wisconsin at Madison's RERCTA, Telecommunications Equipment Distribution Program Association (TEDPA), a deaf-blind representative, and the National Deaf-Blind Equipment Distribution Program (NDBEDP).” Sprint agrees wholeheartedly and urges the Commission to approve expanded membership while retaining TRS providers on the advisory council.

IV. Conclusion

For the foregoing reasons, Sprint respectfully asks the Commission to exclude or exempt Federal VRS services from participation in proposed auction/bidding, adopt a wait-and-see approach before considering expansion of neutral platforms to iTRS services, and permit providers to continue serving on the proposed advisory council while expanding the scope and membership of the advisory council.

Respectfully submitted,

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